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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

v.

DONALD J. TRUMP, *et al.*,

Defendants.

Case No. 3:25-cv-03698-SI

DECLARATION OF STEPHEN M. BILLY

1 I, Stephen M. Billy, declare, pursuant to 28 U.S.C. § 1746, as follows:

2 1. I currently serve as a Senior Advisor for the Office of Management and Budget
3 (OMB), Executive Office of the President. I have occupied this position since January 24, 2025.

4 2. The portion of the Court's Order requiring disclosure of all Defendant Agency
5 Reorganization and RIF Plans (ARRPs) will irreparably harm OMB, the U.S. Office of Personnel
6 Management (OPM), and Defendant Agencies if it is not quashed.

7 3. ARRPs are distinct from actual RIFs. ARRPs have many recommendations distinct
8 from plans for specific RIFs. They typically include plans for changes that would take place many
9 years in the future, if those changes take place at all.

10 4. ARRPs include highly sensitive information that would seriously undermine
11 agency operations if they were released. Such information includes strategies for agency
12 negotiations with unions; plans and strategies for personnel reorganization that may or may not
13 materialize, but might seriously hurt agency recruitment and retention if released; plans and
14 strategies regarding present and future regulatory changes; plans and strategies for present and
15 future appropriations requests; plans and strategies for congressional engagement; and plans and
16 strategies for agency IT management.

17 5. In addition to containing significant amounts of sensitive information, ARRPs are
18 deliberative in nature, subject to change at any moment as the agency's needs, missions, and
19 staffing evolve or as new leadership joins an agency. Nothing in an ARRPs, or its review or
20 approval by OPM or OMB, binds the agency to any particular course of action.

21 6. No ARRPs is ever "final." ARRPs are living documents that are always subject to
22 change as agency needs and circumstances may dictate, or simply due to an agency rethinking or
23 reconsidering an issue. They may change drastically as a result of new leadership joining an
24 agency, as agency officials are confirmed by the Senate to their posts. Indeed, the non-final and
25 frequently changing nature of ARRPs is one of the reasons OMB and OPM requested that the
26 agencies submit monthly progress reports in May, June, and July.

27 7. ARRPs are internal agency planning documents that lack any immediate force or
28 effect. They were developed thoughtfully and carefully by agencies, and invariably include the

1 agency's close consideration of its own statutory functions and authorities and its own long-term
2 workforce planning needs.

3 8. In many cases, ARRP's include ideas for reforms aimed at improving agency
4 efficiency in delivering services to the American taxpayer—but those reforms, again, frequently
5 reflect the agency's current thinking involving potential changes that may or may not take place
6 in the intermediate or distant future, and are always subject to change for any reason.

7 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
8 and correct based on my personal knowledge.

9 Dated: May 11, 2025

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11
12 /s/ Stephen M. Billy
13 Stephen M. Billy
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